

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK** X

MEDITERRANEA NAVIGAZIONE SPA,

06 CV 6700 (JGK)

Plaintiff,

v.

AFFIDAVIT

**INTERNATIONAL PETROCHEMICAL GROUP
S.A.,**

 Defendant. X

Jurg Johner, being duly sworn, deposes and says:

1. I am the Chief Financial Officer of International Petrochemical Group, S.A. ("IPCG").
2. IPCG is an international petrochemical trading company headquartered in Geneva, Switzerland.
3. On or about September 25, 2006, we were advised by our bank, Rosbank (Switzerland) S.A., that \$473,857.15 of an amount of \$2,200,000 we had attempted to pay to a trading company in New York, Nizhnekamskneet Republi, at its bank, Citibank N.A., Park Ave. N.Y.C. had been attached while in the hands of an intermediary bank in New York, The Bank of New York. A copy of the Rosbank (Switzerland) S.A. notice to us is attached as Exhibit "A".
4. Our counsels, De Koning & Mulder of Amsterdam, The Netherlands and Cone & Kilbourn of New York have advised me that the referenced attachment is the result of an order of attachment issued by the United States District Court for the Southern District of New York bearing the index number and heading as set forth above.
5. The funds when attached were not the property of IPCG but had already been nominated by us for the benefit of Nizhnekamskneet

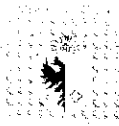
Republi. Further, at the time of attachment, the funds were already out of our control (and that of our bank) and were in transit in the hands of The Bank of New York acting as an intermediary.

6. As a consequence of the foregoing, the attachment should be vacated.

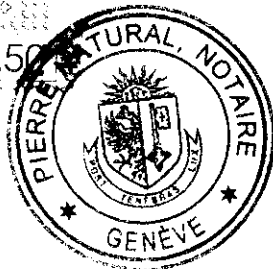
Dated: January 10th, 2007

Jurg Johner

Sworn to before me this 10th of January 2007
at the offices of Maitre Natural, notary, Geneva,
Switzerland.



Fr.2.50



MAITRE PIERRE NATURAL

NOTAIRE

9, place du Molard

Case postale 3452 - 1211 GENEVE 3

Tél. (0041)22 310.73.74 - Fax. (0041)22 310.73.76

APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Pays: Suisse
2. Lieu: Genève
3. Nom: Re P. NATURAL
4. Qualité: Notaire
5. Date: 10 JAN 2007

6. le 10 JAN 2007

7.

République et Canton de Genève

8. sous N° 4926

9. Coeur timbre



Patrick MILLER
Notaire

25. SEP. 2006 11:00

ROSBANK (SWIT, 1SA, GE +41228187320

N#2656 P. 1/1

MESSAGE RECEPTION IMP_RSBPRT10.059965 23/09/06 01:43:24 Page 01

 Company: UNEXIM
 Message: R19906092231 7840 Queue: CDOC Nature: SWF Type : 199
 MUR : CIS06092251 0800 Unit : CDOC Network: SWIFT Prio : N
 Created: 23/09/06 01 43:07
 Message mention(s) : ORIGINAL
 Operations mention(s) : MESSAGE AUTHENTICATED
 Transmitter : Correspondent : IRVTUS3NXXX JT : IRVTUS3NCKXX
 ISN/OSN : 1760.7 Session Number : 1275
 ----- MT199 : Message Text -----

FROM : BANK OF NEW YORK
 NEW YORK, NY UNITED STATES

TO : ROSBANK (SWITZERLAND) SA
 GENEVA SWITZERLAND

DATE : 23/09/2006

MTN99 : FREE FORMAT MESSAGE
 (20) TRANSACTION REF. NO. CIS0609225160800
 (79) NARRATIVE
 ATTENTION: OFAC COMPLIANCE.
 OUR REF CIS0609225160800.
 REGARDING YOUR SWIFT INSTRUCTIONS NUMBER
 FTS0609221567900 DATED 060922, FOR USD
 2,220,000.00 VALUE (56922 IN SAME DAY FUNDS BY
 ORDER INTERNATIONAL PETROCHEM FOR FURTHER CREDIT
 TO CITIBANK N.A. 399 PARK AVENUE NEW YORK, NEW
 YORK 10043 FOR THE ACCOUNT OF NIZHNEKAMSKOYEFT
 REPUBLIC REFERENCE 021277TRC072145 DETAILS
 ACC/BENEFICIARY HODS ACCOUNT WITH//ACB 'SPURT'
 /SWIFT: SPRURRUZK / 'THROUGH ACCOUNT: 0104285418.
 PLEASE BE ADVISED THE WIRE IS RESTRAINED TO A WRIT
 OF MARITIME ATTACHMENT IN THE MATTER OF
 MEDITERRANEA DI NAVIGAZIONE SPA V. INTERNATIONAL
 PETROCHEMICAL GROUP. SA THE ATTORNEYS FOR THE
 PLAINTIFF ARE CARDILLO AND CORBETT. THEIR PHONE
 NUMBER IS 212-344-0464. THE DOCKET NUMBER IS 06 CIV
 6700. THE JUDGMENT AMOUNT IS USD 473,857.15. THANK
 YOU.
 REGARDS, SEJLA SEHIC 315-765-4179 , PLEASE
 RESPOND TO FID-BLOCK ENTITY.
 (-) END OF MESSAGE

 END MESSAGE RECEPTION IMP_RSBPRT10.059965

31205788683

Room 609
Att: P. Kalugin

Fax: 00377 93252498

EXHIBIT "A"